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April 29, 2014

VIA E-MAIL AND ECF

The Honorable Katherine B. Forrest
United States District Court Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: Clecio Lira v. Eagle Open Kitchen LLC, et. al., No. 14-cv-2356 (KBF)

Dear Judge Forrest:

This Firm represents Defendants Eagle Open Kitchen LLC, Robert Berk, Derek Danton and Oscar Penalosa ("Defendants") in the above-titled action. I am lead counsel for Defendants in this case.

We request that Defendants' time to answer, move or otherwise respond to Plaintiff's Complaint be extended from May 2, 2014 until May 16, 2014. There has been no previous request for an extension of this deadline. Plaintiff's counsel, Michael Taubenfeld, consents to this request. Since the undersigned attorneys for Defendants were recently retained as counsel, the requested extension will allow us adequate time to investigate and respond to Plaintiff's Complaint.

Additionally, Defendants' request, again with the consent of Plaintiff's counsel, that the initial pre-trial conference scheduled for May 16, 2014 be rescheduled for May 30, 2014 or at another time amenable to the Court's schedule.

In order to expedite this case, Defendants have agreed to accept service on behalf of Oscar Penalosa and to waive any challenges to service of process for any of the Defendants.



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Thank you for your consideration of these requests.

Respectfully submitted,

SEYFARTH SHAW LLP



Peter A. Walker

cc: Michael Taubenfeld
Alan Serrins
Lori M. Meyers

